

Phillips v. Collin Cnty. Cmty. Coll. Dist., et al.

Exhibit C:
Declaration of
Michael Phillips

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JOSEPH MICHAEL PHILLIPS,

Plaintiff,

v.

COLLIN COUNTY COMMUNITY
COLLEGE DISTRICT, et al.,

Defendants.

**DECLARATION OF MICHAEL
PHILLIPS IN SUPPORT OF
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Civil Action No.: 4:22-cv-184

Pursuant to 28 U.S.C. § 1746(2), I, Joseph Michael Phillips, declare the following:

1. I am a citizen of the United States. I am over eighteen (18) years of age and fully competent to make this declaration. I knowingly and voluntarily make this declaration in support of Plaintiff's Motion for Partial Summary Judgment. If called as a witness, I could and would testify competently under oath to the following facts based on my personal knowledge.

2. I am a plaintiff in the above-captioned action challenging Collin College's violation of my First Amendment rights.

3. I began working as a history professor at Collin College in 2007. My academic specialization is the history of American race relations, a topic on which I have written numerous articles, one book, and a forthcoming second book.

4. On August 22, 2017, two Collin College administrators, Provost Mary McRae and former Dean Millie Black, summoned me to a meeting and gave me a memorandum explaining that I violated Collin College's Employee Expression policy by publishing an open letter in the *Dallas Morning News* calling for the removal of Confederate monuments.

5. On August 3, 2019, a former Collin College student opened fire in a Walmart in El Paso, Texas, targeting Mexican patrons. The next day, President Matkin issued a directive, stating "Please refer all press inquiries you may receive to Marisela Cadena-Smith at ... or by phone to the president's office"

6. Following the tragedy, a *Washington Post* reporter contacted me for an interview about my area of expertise—race relations in the Dallas area—to provide context for a story about the El Paso gunman.

7. I asked the reporter not to mention my affiliation with Collin College, and instead identify me as an author and a scholar of race relations.

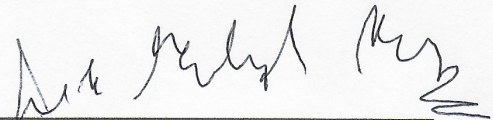
8. The gunman was not my student and I had no confidential knowledge or other inside information relating to the gunman.

9. The *Washington Post* article was published on August 9, 2019, and referred to me as "a Collin College professor and historian of race relations in the Dallas-Fort Worth region."

10. In October 2021, the East Texas Historical Association named me
“Educator of the Year” for my work as a history professor at Collin College.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 10, 2023



Joseph Michael Phillips